

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) CRAIG PC SALES & SERVICE
LLC, an Oklahoma domestic limited
liability company;
(2) RAY T. CRAIG, SR., an individual;
and
(3) RAY T. CRAIG, JR., an individual,

No. CIV-17-3-J

Plaintiffs,

v.

(1) CDW GOVERNMENT, LLC, an
Illinois limited liability company; and
(2) MICROSOFT CORPORATION, a
Washington corporation,

Defendants.

**DEFENDANT’S OBJECTIONS TO PLAINTIFFS’
AMENDED FINAL EXHIBIT LIST**

Defendant CDW Government, LLC submits its objections pursuant to the Federal Rules of Evidence (“FRE”) to plaintiffs’ Amended Final Exhibit List [Doc. No. 255] as follows:

No .	Description	Expected to Use	May Use	Bates	Objections
1	CDWG Sales Policies	X		CDWG 212-537 CDWG 612-680 CDWG 712-784	
2	CDWG Corporate Software Sales Slideshows		X	CDWG 681-711	
3	CDWG Software Sales Records/Open License Order Confirmations		X	Craig 15827-15828 Craig 15975-16066 Craig 16253 Craig 16258-16261 Craig 16499-16500	FRE 401-403

No .	Description	Expected to Use	May Use	Bates	Objections
				Craig PC 849-853 OAG-Craig PC 9380 OAG-Craig PC 9389-9392 OAG-Craig PC 9436-9437 OAG-Craig PC 9440 OAG-Craig PC 9466-9467 OAG-Craig PC 9470-9471	
4	CDWG Commercials	X		Links to videos will be produced.	FRE 401-402, 901
5	CDWG Website Sections, Statements, and Articles	X		Craig 15817-15820 Additional pages available at https://www.cdwg.com/	FRE 401-402, 901
6	Certain Licenses Purchased by Craig PC/School Districts from CDWG		X	Craig 1090-1111	
7	CDWG Quotes for Craig PC/School Districts		X	CDWG 58-101 Craig 6654 Craig 14688 Craig 16162-16163	
8	CDWG Portal		X	Craig 21712-21726	FRE 401-402, 901
9	Audio of Dee Griggs Call with Cesar		X	None	
10	Transcript of Dee Griggs Call with Cesar		X	Craig 1493-1503	FRE 401-403
11	Audio of Dee Griggs Call with John/Juan		X	None	

No .	Description	Expected to Use	May Use	Bates	Objections
12	Transcript of Dee Griggs Call with John/Juan		X	Craig 16101-16117	FRE 401-403
13	Ray Craig II Medical Records		X	Craig 21198-21531	
14	Ray Craig Sr. Medical Records		X	Craig 20985-21197	
15	News Articles re: Plaintiffs and Criminal Allegations		X	Craig 1252-1254 Craig 1259 Craig 1812-1850	
16	Plaintiffs' Bank Account and Financial Transaction Information		X	Craig 1578-1707 Craig 15079-15213 Craig 16266-16280 Craig 16305-16319	
17	Plaintiffs' Mugshots	X		Craig 1089	FRE 401-403
18	Craig PC Profit and Loss Statements		X	Craig 1-22 Craig 21727-21730 Craig 21732-21733	
19	Craig PC Tax Returns		X	Craig 70-292	
20	Ray Craig II Tax Returns		X	Craig 23-69 Craig 293-595	
21	Ray Sr. and Margaret Craig Tax Returns		X	Craig 596-812	
22	Craig PC Sales by Customer Detail		X	Craig 813-915 Craig 14704-15078 Craig 16571 Craig 16586 Craig 16601 Craig 16606	
23	Craig PC School Customers Lost/Recovered Report		X	Craig 21734-21736	
24	Craig PC Sales by		X	Craig 1708-1741	

No .	Description	Expected to Use	May Use	Bates	Objections
	Customer Summaries			Craig 16567-16607 Craig 21731	
25	Craig PC Custom Transaction Detail Reports		X	Craig 15830-15845 Craig 18644-18669 Craig 18684-18691 Craig 18715-18721 Craig 21737-22115	
26	Craig PC Certificate of Conversion and Articles of Organization		X	Craig 1742-1744	
27	Craig PC Operating Agreement		X	Craig 1745-1756	
28	Craig PC Invoices and Orders		X	Craig 3127-4229 Craig 6652 Craig 6656 Craig 15388-Craig 15499 Craig 15865-15927 Craig 16254-16257 Craig 16262 Craig 18722-20964 OAG-Craig PC 9441 OAG-Craig PC 9486-9487 OAG-Craig PC 9492-9494 OAG-Craig PC 9501-9510 OAG-Craig PC 9687	
29	Craig PC Maintenance Contracts		X	Craig 17892-18053	
30	Craig PC E-Rate Contracts, Numbers. And Commitments		X	Craig 16418-16429 Craig 18054-18628	
31	Plaintiffs' Fees and Costs of	X		Craig 20968-20981	FRE 401-403

No .	Description	Expected to Use	May Use	Bates	Objections
	Defense for Criminal and Forfeiture Litigation				
32	Ed Bott Expert Report (including any and all supplements), CV, and Fed. R. Civ. P. 26 Disclosures		X	Doc. 213-1	FRE 401-403, 702-705, subject to <i>Daubert</i> motion
33	Will Clark, Ph.D. Expert Report (including any and all supplements), CV, and Fed. R. Civ. P. 26 Disclosures		X	Doc. 213-2	FRE 401-403, 702-705, subject to <i>Daubert</i> motion
34	Communications sent or received by Josh Parker		X	Craig PC 1-9 Craig PC 12-21 Craig PC 23-30 Craig PC 43-49 GJ Craig 9603 GJ Craig 9605 Craig 1811 Craig 14655-14663 Craig 14665-14675 Craig 14677-14684 Craig 14700-14701 Craig 15824-15826 Craig 15829 Craig 16171-16191 Craig 21706-21708	
35	Communications sent or received by Tyler Hardy		X	Craig 15821 Craig 16192 MSFT_CRAIG 1384 OAG Craig PC 9360-9361	
36	Communications sent or received		X	Craig 14691	

No .	Description	Expected to Use	May Use	Bates	Objections
	by Chyanne Rooney			Craig 14694-14695 Craig PC 43	
37	Communications sent or received by Robert Marc Boles		X	Craig 18644-18669	FRE 401-403
38	Communications sent or received by Dee Griggs		X	Craig 16078-16079	FRE 401-403
39	Communications sent or received by Deborah Decker		X	APS 45	
40	Communications sent or received by Steve Gremпка		X	Craig 15823 Craig 22118-22119	
41	Communications sent or received by Sean Mitchell		X	Craig 18672-18676 Craig 18679	
42	Communications sent or received by Ross Ladwig		X	Craig 18677-18678	
43	Communications sent or received by Robert Culicchia		X	Craig 14685-14687 Craig 14690-14694 Craig 14695-14696 Craig 16159-16170 Craig PC 31-42	
44	Scott Forbes Investigative File		X	Coyle Law Firm Production 3337-3402	FRE 801-803
45	Certain Filings, Exhibits, and Transcripts from United States of America v. One 2011 Chevrolet Equinox, et al, W.D. Okla. Case No. CIV-11- 710-M		X	Craig 1029-1088	

No .	Description	Expected to Use	May Use	Bates	Objections
46	Certain Filings, Exhibits, and Transcripts from State of Oklahoma v. Ray Craig Sr., Ray Craig II, and Jay Jerdee, Grady County Case Nos. CF-2014-373, CF-2014-374, and CF-2014-375		X	Craig 17257-17878 Craig 21705 OAG Craig PC 1490-1501 OAG Craig PC 1502-1504	
47	Certain Filings, Exhibits, and Transcripts from In the Matter of Seizure of Certificate of Deposit #8400367396-1, et al, W.D. Okla. Case No. CIV-11-162-M		X	Craig 16297-16296 Craig 16302	FRE 401-403
48	Certain Filings, Exhibits, and Transcripts (with exhibits) from the Grand Jury proceedings instituted in the U.S. District Court for the Western District of Oklahoma regarding Ray Craig II		X	Craig 2923-3126 Craig 4230-13570	FRE 401-403
49	Microsoft Website: "Solving the Mystery of Windows		X	Craig 1808-1810	FRE 401-403

No .	Description	Expected to Use	May Use	Bates	Objections
	Desktop Licensing”				
50	Microsoft Website: “Get Genuine Solutions”		X	Craig 15797-15798	FRE 401-403
51	Microsoft Website: “Which Would You Choose?”		X	Craig 15804-15805	FRE 401-403
52	Microsoft Website: “Microsoft Launches Anti-Piracy Campaign in the Northeast”		X	Craig 15792	FRE 401-403
53	Microsoft Website: Microsoft Files Lawsuits Against Three Portland-Area Resellers in First Oregon Anti-Piracy Sweep		X	Craig 15793-15794	FRE 401-403
54	CRN: Microsoft Sting Targets Resellers for Alleged Hard-Disk Loading		X	Craig 15795	FRE 401-403
55	Seattle PI: Microsoft Files 21 Piracy Suits		X	Craig 15796	FRE 401-403
56	CDWG Website: “CDW-G Honored as a Microsoft Public Sector Partner of the Year for Education”		X	Craig 21709-21710	FRE 401-403

No .	Description	Expected to Use	May Use	Bates	Objections
57	Microsoft Website: Ed Bott MVP		X	Craig 22116-22117	FRE 401-403, 702-705
58	Sysprep (System Preparation Tool)		X	Craig 18630-18633	
59	Product and Volume Licensing Keys		X	Craig 6662 Craig 21694-21699	
60	Microsoft License Records		X	Craig 1112-1117 Craig 18693-18714	
61	Microsoft Licensing Product Use Rights		X	MSFT_CRAIG 3717-3955	
62	Microsoft Packing Lists		X	Craig 6663 Craig 6671 Craig 6678	
63	FBI Investigation Records		X	FBI-REPORT 1-247 Craig 13571-14654 Craig 16320-16417 Craig 16430-16566	FRE 801-803
64	Application for Search Warrant / Affidavit		X	OAG Craig PC 1208-125	
65	Microsoft Licensing Spreadsheets and Information		X	Craig 1510-1568 Craig 15214-15257	
66	Help My School List of School Names		X	Craig 18629	FRE 401-403
67	Ray Craig Sr. Plea Form: CM-2016-643		X	Craig 18692	FRE 401-403
68	WIN Numbers		X	Craig 1509	
69	Letter from US DOJ to Superintendents		X	Craig 16281	

No .	Description	Expected to Use	May Use	Bates	Objections
70	Industry System Invoice to Lindsay Public Schools		X	Craig PC 842-845	FRE 401-403
71	US DOJ Property Receipt Return to Anadarko Public Schools		X	APS 46-47	FRE 401-403
72	Letter from US DOJ to David Davidson		X	GJ Craig 6522	FRE 401-403
73	Purchase Orders to Apple, Inc.		X	Craig 17883-17891	
74	Email from CDWG to Bryan Raymer		X	Craig 1260-1261	
75	USDOJ: Property Received and Receipts from Anadarko Public Schools		X	APS 46-47	
76	Email from Randy Bradley to Deborah Decker		X	Craig 21566	
77	Emails from Microsoft to Dee Griggs		X	Craig 6672 Craig 6674	
78	Craig Asset Lists		X	Craig 16263-16265 Craig 18630-18633	
79	Emails between CDWG and Craig PC		X	Craig 16159-16161 Craig 16164-16192	
80	Do Not Contact List		X	Craig 16303-16304	
81	Ed Bott Underlying Report		X	Craig 15761-15826	FRE 401-403, 702-705, subject to <i>Daubert</i> motion

No .	Description	Expected to Use	May Use	Bates	Objections
82	2016 Shareholders Summary		X	Craig 260	
83	Microsoft OEM System Builder License		X	MSFT_CRAIG 3380-3381	
84	Open License Welcome Notification		X	Craig 1238	
85	Microsoft License Verification for Upgrade		X	MSFT_CRAIG 3956-3957	
86	Searchand Seizure Warrant		X	Craig 16282-16286	
87	Craig PC Volume Licensing Log		X	Craig 21700-21702	
88	Audio of Conversation with Thomas Diamond		X	Craig 21711	FRE 401-403, 901
89	Communications sent or received by Jay Montblanc		X	Craig 6664-6665	
90	Communications sent or received by Liz Hiszczynski		X	1308-1408	
91	Communications sent or received by Oleg Krylod		X	Craig PC 10-11	
92	CDWG Order for Anadarko Public Schools		X	Craig 20967	
93	Microsoft Volume Licensing Service Center –		X	Craig 22120	

No .	Description	Expected to Use	May Use	Bates	Objections
	Downloads and Keys				
94	Jay Montblanc Resume		X	Craig 22121	FRE 401-403
95	Tyler Hardy Deposition from March 10, 2014		X	None	Improper exhibit; must designate deposition testimony
96	CDWG Tech Data Price Lists		X	CDWG 785-852	
97	Microsoft Select Plus Agreement		X	CDWG 853-870	
98	CDWG List		X	CDWG 871	
99	Microsoft Licensing Product Use Rights		X	CDWG 872-937	
100	Reference Guide		X	CDWG 938-940	
101	CDWG Records Retention Schedule		X	996-1017	
102	CDW Electronic Communications Policy		X	1018-1023	
103	CDW Draft Retention Policy		X	1269-1295	
104	Tyler Hardy Personnel File		X	1024-1268	FRE 401-403
105	Joshua Parker Personnel File		X	1296-1307	FRE 401-403
106	Information and Statements for Schools		X	MSFT_CRAIG 1018-1049 MSFT_CRAIG 1725-1958	
107	Documents Produced by Anadarko Public		X	APS_1-47	FRE 401-403

No .	Description	Expected to Use	May Use	Bates	Objections
	Schools via Subpoena				
108	Documents Produced by Binger-Oney Public Schools via Subpoena		X	BOS_1-324	FRE 401-403
109	Documents Produced by Boone-Apache Public Schools via Subpoena		X	BAPS_1-315	FRE 401-403
110	Documents Produced by Caddo Kiowa Technology Center via Subpoena		X	CKTC_1-519	FRE 401-403
111	Documents Produced by Cement Public Schools via Subpoena		X	CPS_1-92	FRE 401-403
112	Documents Produced by Central High School via Subpoena		X	CHS_1-8	FRE 401-403
113	Documents Produced by Copan Public Schools via Subpoena		X	CNPS_1-3	FRE 401-403
114	Documents Produced by Cyril Public Schools via Subpoena		X	CYPS_1-301	FRE 401-403
115	Documents Produced by		X	EPS_1-20	FRE 401-403

No .	Description	Expected to Use	May Use	Bates	Objections
	Erick Public Schools via Subpoena				
116	Documents Produced by Fletcher Public Schools via Subpoena		X	FPS_1	FRE 401-403
117	Documents Produced by Glencoe Public Schools via Subpoena		X	GPS_1-21	FRE 401-403
118	Documents Produced by Hinton Public Schools via Subpoena		X	HPS 1-996	FRE 401-403
119	Documents Produced by Peckham Public Schools via Subpoena		X	PPS_1-4	FRE 401-403
120	Documents Produced by Ringwood Public Schools via Subpoena		X	RSD_1-4	FRE 401-403
121	Documents Produced by Ripley Public Schools via Subpoena		X		FRE 401-403
122	Documents Produced by Robin Hill Public Schools via Subpoena		X	RHPS_1-116	FRE 401-403

No .	Description	Expected to Use	May Use	Bates	Objections
123	Documents Produced by Thackerville Public Schools via Subpoena		X	TPS_1-13	FRE 401-403
124	Documents Produced by Timberlake Public Schools via Subpoena		X	TLPS_1-140	FRE 401-403
125	Documents Produced by Union City Public Schools via Subpoena		X	UCPS_1-120	FRE 401-403
126	Documents Produced by Verden Public Schools via Subpoena		X	VPS_1-135	FRE 401-403
127	Documents Produced by Lindsay Public Schools via Subpoena		X	LPS_1-112	FRE 401-403
128	Documents Produced by Maysville Public Schools via Subpoena		X	MVPS_1-61.047	FRE 401-403
129	Documents Produced by Middleberg Public Schools via Subpoena		X	MPS_1-74	FRE 401-403
130	Documents Produced by Minco Public		X	MSD_1-2.004 MSD_3-102	FRE 401-403

No .	Description	Expected to Use	May Use	Bates	Objections
	Schools via Subpoena				
13 1	Documents Produced by Mountain View-Gotebo Public Schools via Subpoena		X	MVGS_1-115	FRE 401-403
13 2	Documents Produced by Ninnekah Public Schools via Subpoena		X	NPS_1-470 NPS_471-489	FRE 401-403
13 3	Documents Produced by Hydro-Eakly Public Schools via Subpoena		X	HEPS_1-191	FRE 401-403
13 4	Documents Produced by Sterling Public Schools via Subpoena		X	SPS_1-25.072	FRE 401-403
13 5	Documents Produced by Gracemont Public Schools via Subpoena		X	GMPS_1-55 Some are not bates stamped	FRE 401-403
13 6	Documents Produced by Riverside School District via Subpoena		X	RSSD_1-25	FRE 401-403
13 7	Documents Produced by Industry Systems via Subpoena		X	Industry Systems 1-203	FRE 401-403

No .	Description	Expected to Use	May Use	Bates	Objections
138	Documents Produced by the Oklahoma Attorney General's Office via Subpoena		X	OAG/CRAIG PC 1-12807	FRE 401-403; FRE 801-803
139	All exhibits identified by CDWG not successfully objected to by Plaintiffs		X	See Doc. 241	
140	All documents Exchanged during discovery or used as an exhibit by any party in a deposition or filing not otherwise identified herein and not successfully objected to by Plaintiffs		X	Craig 1-22121 CDWG 1-1410 MSFT_CRAIG 1-3957	Objections reserved
141	All documents discovered or created after the date of this List not successfully objected to by Plaintiffs		X	N/A	Objections reserved
142	Documents for rebuttal and/or impeachment		X	N/A	Objections reserved

Submitted this 10th day of September 2021.

Respectfully submitted,

s/Ronald T. Shinn, Jr.

Ronald T. Shinn, Jr., OBA #19569

McAfee & Taft, P.C.

8th Floor, Two Leadership Square

211 N. Robinson

Oklahoma City, OK 73102

Telephone: 405-235-9621

Facsimile: 405-228-7323

ron.shinn@mcafeetaft.com

Thomas C. Koessl (admitted *pro hac vice*)

Samera S. Ludwig (admitted *pro hac vice*)

Christopher R. Sullivan (admitted *pro hac vice*)

L&G LAW GROUP LLP

175 West Jackson Blvd, Suite 950

Chicago, IL 60604

Attorneys for Defendant,

CDW Government, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the file-stamped date above, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Stanley M. Ward
Woodrow K. Glass
Jonathan M. Irwn
Geoffrey A Tabor
Travs E. Harrison
Ward & Glass LLP
1601 N.W. 36th Avenue, Suite 100
Norman, OK 73072

Brad Burns
Burns Law Office
519 W. Chickasha Avenue
Chickasha, OK 73018

Ronald T. Shinn, Jr.
McAfee & Taft
10th Floor, Two Leadership Square
211 N. Robinson
Oklahoma City, OK 73102

William S. Leach
McAfee & Taft
Williams Center Tower II
Two West Second Street, Suite 1100
Tulsa, OK 74103

Bret Burns
Burns Law Office
519 W. Chickasha Avenue
Chickasha, OK 73018

Robert D. Nelon
Lindsay N. Kistler
100 North Broadway, Ste. 2900
Oklahoma City, OK 73012

Bonnie E. MacNaughton
Ambika K. Doran
Zana Bugaighis
Xiang Li
Cesar Kalinowski
Davis Wright Tremaine LLP
1201 Third Avenue, Ste. 2200
Seattle, WA 98101

s/Ronald T. Shinn, Jr.